

FILED
JAMES BONINI
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR SOUTHERN DISTRICT OF OHIO, WESTERN
DIVISION

06 JUL 26 PM 3:21

William D.Reynolds, Col.USAF Ret.
Plaintiff,
vs.,

Case No. C-1-01-877, removed from
Common Pleas Court, Brown County,
Ohio Case No. 20010713 by counsel
John E.Vincent.

Windell Crawford, et.al.
Defendants

Plaintiff's Response to DEPOSITION as
directed by The Court at Hearing
6/7/2006 in the presence of counsel
Vincent, Judge Herman J.Weber presiding.

1. Plaintiff received COURTESY COPY of DEPOSITION of HIM conducted
FEB 6, 2006, on APR 28, 2006.

2. File-Stamped MAY 22, 2006 was Plaintiff's TIMELY RESPONSE to DEPOSITION,
wherein he Complained about the BACK-DATED LETTER by Ms.Denise L.Shoemaker
and the Fact(s):

a. Page 1, line 5 in part, line 6 in part, reads, Quoted: , pursuant to
notice and stipulations of counsel hereinafter set forth, etc.

b. STIPULATIONS were not discussed, PRIOR to DEPOSITION, DURING DEPOSITION,
or IMMEDIATELY AFTER DEPOSITION. (More forthcoming on Page 3.)

PAGE 2, APPEARANCES: Shows William D.Reynolds as Pro se, which is INCORRECT,
when IN FACT he is, William D.Reynolds Col.USAF Ret., and Plaintiff
Pro Se, therefore, counsel gave Ms.Shoemaker FALSIFIED INFORMATION.

PAGE 3, Monday Morning Session, and date of February 6, 2006, IS CORRECT,
HOWEVER,: Line 4 in part, through 8 is CHALLENGED throughout said
Deposition and "that proof of the official character and
qualification of the notary is waived. PLAINTIFF NEVER WAIVED ANY

PORTION of the Character and or QUALIFICATION(s) of Notary/Stenotypist Denise L. Shoemaker, a person Plaintiff never met before FEB 6, 2006, a person Plaintiff DID NOT HIRE, but in FACT was HIRED by counsel Vincent/Landes, therefore, Ms. Shoemaker had a VESTED INTREST for the CONTENT of said Deposition.

PAGE 4, is CORRECT as written.

PAGE 5, is CORRECT as written, however, Plaintiff CHALLENGES the need of counsel Vincent/Landes to know Plaintiff's S/S Number.

PAGE 6, line 10-12 is REDUNDANT to PAGE 5 line 8, 18. Line 20 has four (4) errors by Ms. Shoemaker as Plaintiff flew F-86's, F-86 D's, F-86 L's, F-86 H's, Plaintiff states that he does not know what Air Force 56's, 56-D's and L's, 56-H's are.

PAGE 7, line 23-24, PAGE 8 line 1 is INCORRECT as Written: PLAINTIFF HAS a DD-214 as an ENLISTED MAN, but, Does Not have his HONORABLE DISCHARGE as an ENLISTED MAN and: Plaintiff has his HONORABLE DISCHARGE as an OFFICER, but, Does Not have a copy of his DD-214 as an OFFICER.

PAGE 8, in part is covered on PAGE 7 just above, the balance of Page 8 was a very poor time to set ground rules, by counsel Vincent.

PAGE 9, counsel Vincent begins His Version of Curriculum Vitae upon Plaintiff, when in FACT THE COURT had PREVIOUSLY ORDERED IT, and at Hearing JUN 7, 2006 Plaintiff announced that his was complete.

PAGE 9 line 10 Ms. Shoemaker shows that Plaintiff Does Not know how to spell the NAME OF THE HOMETOWN HE WAS BORN AND

RAISED IN, and counsel Vincent in line 11 REPEATS the ERROR, and in his SOFT VOICE on line 11 and line 12 Plaintiff says YES, even with his Hearing Aids, therefore, this Curriculum Vitae is null and void.

PAGE 10, is correct as written, however, Plaintiff hastens to point out THE COURT that counsel Vincent, THINKS KOREA, was still on-going when, IN FACT, THE ARMISTICE WAS SIGNED JUL 27, 1953 at PANMUNJON, HOWEVER, THE SHOOTING DIDN'T STOP. (See Plaintiff's Curriculum Vitae, Page 1 and therein (4) and (5).

PAGE 11, line 2-12 is Self-Explanatory and CORRECT as stated by Plaintiff, however, counsel Vincent line 13-16 shows Plaintiff that counsel Vincent, WAS NEVER IN THE MILITARY, or he would have known that you are ON CALL TWENTY-FOUR HOURS A DAY, SEVEN DAYS A WEEK.

Line 21 by Denise L. Shoemaker is WRONG. Plaintiff was NEVER in "The 6 Fighter Interceptor Squadron" NOR did he EVER HEAR of such an outfit. Line 12-24 are self-explanatory.

PAGE 12, line 1-21 is counsel Vincent's Convolutd Distortion of FACTS, and Deise L. Shoemaker's Inability to Listen and Stenotype on line 19, CORRECTED is: Bronze Star with a V CLASP for valor, NOT A B CLASS for valor.

PAGE 13, Everything is correct as written, line 2-7 and 19-24 are important to remember.

PAGE 14, line 1-16 are correct as written. Line 17 is WRONG. We were married MAY 12, 1969 in Chicago Illinois, therefore, (37) years.

Line 18-24, Plaintiff OBJECTS to this questioning as it was forty three (43) years ago, ALL CHILD SUPPORT PAID.

PAGE 15, PAGE 16, PAGE 17 to line 16 Plaintiff OBJECTS to each question and his Answers as IRRELEVANT and NOT GERMANE in the captioned case, with consideration given that it was forty three (43) years ago.

PAGE 17, line 17-24 is correct as written.

PAGE 18, line 1-3 is correct as written. Line 4-24, Plaintiff OBJECTS to each question and Answer as IT FAILS TO BE IN THE TIME LINE for when Plaintiff was ILLEGALLY ARRESTED and ILLEGALLY INCARCERATED by Deputy, Defendant Clark Gray on OCT 11, 2000 AM 9:13 who was not present at Plaintiff's home that date and hour, therefore in violation of ORC Section 2935.05 and 2935.09, See PLAINTIFF's EXHIBIT B. This was discussed at Hearing on JUN 7, 2006, because, Plaintiff DID NOT GO WITH THE VA UNTIL 2001.

PAGE 19, line 1-5 IS NOT Relevant/Germane in the captioned case. Line 6-24 are counsel Vincent's Convoluted/Distortion of FACTS, wherein his version of Curriculum Vitae, and his Previous Question(s) and Plaintiff's Answers about his children forty three (43) years ago rattled Plaintiff's memory. (See Plaintiff's Curriculum Vitae that he told THE COURT and counsel Vincent, WAS COMPLETED at Hearing JUN 7, 2006, for the Sequence of his career, without UNDUE DURESS, STRESS.

PAGE 20, line 1-8 displays counsel Vincent's CONFUSION, when compared with PAGE 19, line 6-7. Counsel Vincent is UNABLE to GRASP the concept of: While in the MILITARY Plaintiff worked as an OSI Officer in a MANUFACTURING FACILITY, in CIVILIAN DRESS.

PAGE 21, line 1-24 is counsel Vincent's Convolutd/Distortion of FACTS, and successfully rattled Plaintiff, who stated some INCORRECT Answers. (See CURRICULUM VITATE, that Plaintiff told THE COURT and counsel Vincent was completed at Hearing JUN 7, 2006.

PAGE 22, line 1-11 is counsel Vincent's Distortion of FACTS. Line 12-15 are Correct as Written. Line 16 is Convolutd/Distorted by counsel Vincent. Line 18-23 is correct as written, EXCEPT, Plaintiff went to work at STANDEX not AVCO. Line 24 counsel Vincent continues his DISTORTION of Facts, as shown Page 23.

PAGE 23, line 1-5 Clarifies EVERY and ALL ERRORS Plaintiff made, under DURESS. Line 6 counsel Vincent is in AGREEMENT for STANDEX. Line 7 Plaintiff states CORRECTLY, Standex I was promoted to vice president. (Plaintiff had said that back on PAGE 20 line 3-23, [t]hus counsel Vincent's DISTORTION of FACTS.

PAGE 24, EXCEPT line 6-7 by counsel Vincent, the rest of this Page is correct as written.

PAGE 25, is correct as written, EXCEPT line 12 plaintiff's Answer as written by Ms. Denise L. Shoemaker, MAKES IT APPEAR IN THE ANSWER AS: "Past Tense" which is INCORRECT. Plaintiff was put on MEDICARE 12-1-81 HOSPITAL INSURANCE, and 6/1/84 MEDICAL INSURANCE, that was made Retro-Active back to 12/7/1978, and Plaintiff REMAINS ON MEDICARE, as of this filing date.

PAGE 26, is Correct as Written, however, Plaintiff CHALLENGES line 24, as it is NOT in the Time Line for when Plaintiff was Falsely Arrested and Illegally Incarcerated od COMPLAINT by Defendant, Deputy Clark Gray on 10/11/2000 for MINOR-MISDEMEANOR, See

PLAINTIFF'S EXHIBIT B.

PAGE 27, is Correct as Written, however, Plaintiff OBJECTS to the ENTIRE PAGE as it is Not in the Time Line for when Plaintiff was Falsely Arrested and Illegally Incarcerated on COMPLAINT by Defendant, Deputy Clark Gray 10/11/2000 in violation of ORC Section(s) 2935.05 and 2935.09 a Charge Defendant Gray WAS NOT witness to.

PAGE 28, to Plaintiff is nothing more than a FISHING TRIP by counsel Vincent. THE COURT is requested to carefully read line 12-15, then look at the INSCRIBED INFORMATION on Plaintiff's CADUCEUS that hangs around Plaintiff's neck, just like a set of Dog-Tags, Judge Herman J. Weber is familiar with, as a Navy man.

PAGE 29, is Correct as Written down to line 18. Plaintiff's Answer on line 19 is Correct, however, counsel Vincent FAILS to COMPREHEND that his question is SIX YEARS AFTER, Plaintiff was Falsely Arrested and Illegally Incarcerated by Defendant(s) Chris Snider in concert with Larry Meyer on COMPLAINT by Clark Gray for MINOR MISDEMEANOR in violation of ORC Section(s) 2935.05, 2935.09 a Charge Defendant, Deputy Clark Gray WAS NOT WITNESS TO ON 10/11/2000, and EACH Defendant DENIED Plaintiff his Medications that the U.S. Supreme Court ADJUDICATED in OAG 85-054 Page 2-202 Para.2 as a Violation of EIGHTH, (XIII) Ammendment of U.S. Constitution, which proscribes cruel and unusual punishment.

(6.)

PAGE 30, is Correct as Written, however, (1) Counsel Vincent is of the ABSURD NOTION that the Prescription Medication "COUMADIN" is a BLOOD THINNER, which it IS NOT, (2) Counsel Vincent FAILS to COMPREHEND that Plaintiff's Answer, line 19 is True and Correct as stated by Plaintiff. Counsel Vincent's FAILURE TO COMPREHEND lay in the FACT his question on line 17-18 IS FIVE (5+) YEARS AFTER Plaintiff was Falsely Arrested and Illegally Incarcerated by Defendant(s) Deputies Chris Snider in concert with Larry Meyer, DENIED, then Defendant Col. Reynolds, his Medications, on the ILLEGAL COMPLAINT by Defendant Clark Gray for THE CHARGE OF MINOR MISDEMEANOR.

PAGE 31, is correct as Written, however, counsel Vincent IS UNABLE TO COMPRENEND, THE TIME LINE, for WHO was Plaintiff's Physician on the date of 10/11/2000 as shown by Plaintiff, line 18-21.

PAGE 32, is Correct as Written, however, counsel Vincent at Hearing on JUN 7, 2006 REMAINED INSISTENT that Dr. Brody from the VA be Subpoenaed to testify to a Time Line that occured AFTER Plaintiff had been Falsely Arrested and Illegally Incarcerated on COMPLAINT by Defendant, Deputy Clark Gray evidenced in PLAINTIFF'S EXHIBIT B, on the charge of MINOR MISDEMEANOR and Plaintiff points out to the COURT that Clark Gray FAILED to file JURAT. See STATE OF OHIO, APPELLEE, v. GREEN, APPELLANT. [Cite as State v. Green (1988), 48 Ohio App.3d 121.] Plaintiff requests THE COURT ReRead Deposition PAGE 32 line 10-24.

PAGE 33, is Correct as Written. Plaintiff requests THE COURT ReRead Page 33 for WHO was Plaintiff's doctor during the Time Frame PRIOR

to 10/11/2000 and IMMEDIATELY AFTER 10/11/2000,up to the year 2001.

PAGE 34, is Correct as Written, however, counsel Vincent is a DOUBTING THOMAS for Plaintiff's SWORN TESTIMONY, in Deposition. THE COURT should direct counsel Vincent to pull-up Plaintiff's RECORD from NCIC (National Crime Investigation Center) in London, Ohio, because Plaintiff cannot do it for him.

PAGE 35, is Correct as Written, However, counsel Vincent remains a DOUBTING THOMAS for Plaintiff's SWORN TESTIMONY at DEPOSITION. To the best of Plaintiff's Knowledge and Belief counsel Vincent FAILED to check with Hamilton County, Ohio and or NCIC for a RECORD on Plaintiff, and further FAILED to NOTIFY PLAINTIFF of his findings.
(ReRead lines 13-24.)

PAGE 36, is Correct as Written, however, to the best of Plaintiff's knowledge and Belief counsel Vincent FAILED to check out the Sale Transaction in Sharonville, Ohio (Hamilton, Ohio) and further FAILED to check the PROPERTY PURCHASE in Brown County, Ohio, then FAILED to NOTIFY PLAINTIFF of his findings.

PAGE 37, is Correct as Written, however, counsel Vincent Has Stepped Across The Line in questioning Plaintiff about "ANY NEIGHBOR" when in FACT the Captioned Case is about the Defendant(s) FAILURE to enforce the Ohio Revised Code and their FAILURE under 42 Section 1983, titled: Section 1983 Civil action for deprivation of rights., and therein applicable HISTORICAL AND STATUTORY NOTES, CROSS REFERENCES, LIBRARY REFERENCES. Plaintiff shall question "The Neighbors".

PAGE 38, is INCORRECT, line 3-4 by Denise L. Shoemaker, when compared to PAGE

37 line 7-8 and ReConfirmed as INCORRECT by counsel Vincent PAGE 39 line 13-18.

PAGE 39, is Correct as Written, and the INCORRECT Stenotyping by Denise L. Shoemaker has been shown on Page 8 herein and just above.

PAGE 40, is Correct as Written from line 1-6. Line 7-24 by counsel Vincent is a Convolutd Distortion of FACTS. Plaintiff REEMPHASIZES that counsel Vincent is on some kind of Fishing Trip and has Failed to produce any evidence, accordingly.

PAGE 41, is Correct as Written, however, counsel Vincent has opened Pandora's Box about "THE NEIGHBORS" and the 25 Barking Dogs that the Sheriff's Department FAILED to do anything about under the REVISED CODE, the loud motorcycles, go-carts for the 9-10 year olds that still is disturbing as of this filing date.

PAGE 42, is Correct as Written from line 1-6. Line 7-24 is counsel Vincent's Fishing Trip that is without MERIT or FOUNDATION.

PAGE 43, is from line 1-17 counsel Vincent's Fishing Trip that is without MERIT or FOUNDATION. Line 17-24 is FALSIFIED by counsel Vincent as the ILLEGAL CHARGES, by Defendant, Deputy Donnie Wagner, under ORC Section 2935.09, WERE NOT FILED until 3/12/1998 and his ILLEGAL CHARGES were for: Menacing and Resisting. Plaintiff in that case was ILLEGALLY ARRESTED by Defendant, Deputy Jack B. Moore in concert with Dog Warden Michael Darnall, then ILLEGALLY INCARCERATED on THE GHARGE of MINORMISDEMEANOR, DENIED his Medications, Moore and Wagner FAILED to FILE JURAT. [Cite as State v. Green (1988), 48 Ohio App.3d 121.]

(9.)

PAGE 44, is Correct as Written, however, line 1-22 counsel Vincent IGNORES that Defendant(s), Deputies Jack B. Moore and Donnie Wagner both FAILED to write and file JURAT, self-evident that neither one knows what is to be written upon COMPLAINT, in Brown County, Ohio.

Line 21 counsel Vincent's Rush to Judgement, about the 12th District Court of Appeals is also self-evident. Line 22-23 is is another of counsel Vincent's Fishing Trips, established on line 24---and continued on Page 45.

PAGE 45, Counsel Vincent's Fishing Trip continues, line 1-5. Line 6-7 are Correct as Written and Answer line 8 is Correct as Answered. Line 9-20 is more of the DURESS/CHAOS Plaintiff had to endure at the hand of counsel Vincent. Line 21-22 are Correct as Written, and line 23 is Correct as Answered. Line 24 is Correct as Written---and cont., on Page 46 line 1-2, however Plaintiff enters IN MEMORANDUM PLAINTIFF'S EXHIBIT A-1 dated JAN 3, 1995, from her counsel Timothy J. Kelly.

Therein, Paragraph 1 is Hear-Say, Lacking in Merit, nor has she from this letter ever contacted the Prosecutors office for the content of para. 1.

Therein, Paragraph 2 she FAILED to provide any evidence of "CALLING HER HOUSE IN THE MIDDLE OF THE NIGHT TO COMPLAIN ABOUT BARKING DOGS" or the usage of FOUL LANGUAGE, Alleges "THE DOGS THAT ARE BARKING (HER ADMISSION) ARE NOT HER DOGS AND ARE NOT DOGS THAT BELONG TO ANYONE THAT RENTS FROM HER." PLAINTIFF'S EXHIBIT D and therein Account # 333 by Flora Prather shows she has a Vicious Dangerous dog, illegally confined, and Her Renters/Grandson have the following in that Time Frame:

7101 St. Rt. 221, Cindy and Bobby Hicks, Account # 9206 have A KENNEL of (7)

(/s,)

Vicious Dangerous dogs,Illegally Confined on Flora Prather's Property.

7098 St.Rt.221,ACCOUNT #3941,Tony Hicks had (3) Vicious Dangerous dogs,
Illegally Confined,Unlicensed,on the property owned by Flora Prather.

7098 St.Rt.221,ACCOUNT #985,grandson of Flora Prather had (2) Vicious
Dangerous dogs Illegally Confined,Unlicensed,on the property owned by
Flora Prather.

7021 St.Rt.221,ACCOUNT #7026,Belinda Hodge had (2) Vicious Dangerous dogs,
Illegally Confined,Unlicensed,on the property owned by Flora Prather,on
10/11/2000.

This is the date Plaintiff was Falsely Arrested and
Illegally Incarcerated by Defendant(s) Deputies Chris Snider in concert
with Larry Meyer,WITHOUT CHARGE. Then Defendant Clark Gray ILLEGALLY
filed COMPLAINT against Plaintiff for an Alleged Violation that HE WAS
NOT WITNESS TO,in violation of the Ohio Revised Code for the Charge of
MINOR MISDEMEANOR.

Deputies Chris Snider and Larry Meyer REFUSED to go to the address of
7021 St.Rt.221 to investigate BARKING DOGS as stated at least TWICE by
Plaintiff on Tape Recording on 10/11/2000.

Plaintiff's dog WAS NOT BARKING because the Vicious Dangerous dogs
that roamed the neighborhood,nearly tore his throat out and had to be
Euthanized (52) days BEFORE 10/11/2000,[t]hus it WAS NOT BARKING,
however,Belinda Hodge lived in the trailer,owned by Flora Prather.(See
EXHIBIT D and therein EXHIBIT 2.)

Paragraph 3 of EXHIBIT A-1 is FALSIFIED by Flora Prather and is
evidenced by the FACT that her mail-box is sitting exactly where her
grandson Dwayne Daugherty placed it,which is five (5) feet BACK from

the "White Edge Stripe" on the West Edge of St.Rt.221, Southbound, and is depicted in EXHIBIT A-2. It is to be noted that Flora Prather's other (6) Mail Boxes DO NOT sit (5) feet off the edge of St.Rt.221.

Flora Prather's INTENTIONS are clear to Plaintiff as she knew the Reynolds' received a lot of packages to large to go into their Mail Box, and as depicted in EXHIBIT A-2 MUD was carried by the mail delivery person(s) upon Plaintiff's Blacktopped Driveway.

Paragraph 4 of Flora Prather's letter FAILS to have any MERIT and is nothing more than Hear-Say since COMPLAINTS by her renters Were Not Included with EXHIBIT A-1.

Paragraph 5 of Flora Prather's letter is FALSIFIED and is LIBELOUS in Content. Be it known to THIS COURT and counsel Vincent that Flora Prather FAILED to provide any Evidence of Plaintiff SHOOTING AT THE CHILDREN IN THE AREA and further FAILED to provide any Evidence of a NAIL BOARD.

Plaintiff HAS NEVER been ARRESTED and or QUESTIONED about Shooting his Gun "AT THE CHILDREN IN THE AREA" by the Brown County, Ohio Sheriff's Department and or the Prosecuting Attorney's office. (Plaintiff's Curruculum Vitae, announced to THIS COURT and counsel Vincent on 6/7/2006 and therein Page 1, #1 (4), reads, Quoted: Completed Boot Camp as a grunt rifleman and found himself in a Hell Hole called Korea, Grunt Rifleman could CONSISTENTLY shoot EXPERT at 200 yards and more often than not EXPERT at 500 yards, with the M-1 Garrand Rifle. Now I ask THIS COURT and counsel Vincent if they believe that Plaintiff "SHOT AT THE CHILDREN IN THE AREA" on some UnSpecified date??

Lastly, Flora Prather FAILED to furnish Evidence that Plaintiff SLANDERED Mrs. Prather, Dwayne Daugherty and Eunice Adae to NUMEROUS PEOPLE around Higginsport.

Plaintiff's response to LITTLE TIMMY KELLY is attached to EXHIBIT A-1, and dated 2/1/95.

EXHIBIT F written by counsel Vincent/Landes and filed with the Court 11/25/2002 in part reads, Page 14 in part line 2-7 reads Quoted:

Specifically, Plaintiff alleges that he had prescription drugs in his home at the time that he was arrested. (Plaintiff's Complaint at p.6.)

Following his arrest, Plaintiff claims that he advised the Brown County Jail that he "needed his morning prescriptions...", in response to which the Brown County Deputies "offered Plaintiff a 2nd phone call to get his medications..." which Plaintiff used to call his neighbor who brought his medications to the Brown County Jail. (Plaintiff's Complaint at p.6.) Etc.

1. Counsel Vincent/Landes FAILED to say WHO BY NAME was the neighbor that brought Plaintiff's medications to the Jail, HOW did that neighbor get Plaintiff's keys to his home, HOW did the neighbor know where Plaintiff's medications were located inside his home, and how did the neighbor know which were "MORNING MEDICATIONS" and the RX numbers for them, especially if there were EVENING MEDICATIONS.
2. Both Defendant(s) Chris Snider and Larry Meyer FAILED to read Plaintiff Miranda v. Arizona evidenced in P.C.A., Supplemental Reports and Sworn Affidavits by each of them, Meyer on 6 NOV 2002 and Snider on 15 NOV 2002.
3. Each Defendant, Deputies Chris Snider, Larry Meyer or Clark Gray Wrote or Filed JURAT under Crim.R.3, yet Plaintiff HAD TO STAND TRIAL.
4. Counsel Vincent shows Plaintiff's Wife Phyllis J. Reynolds on his Witness List, who was out of town on 10/11/2000, therefore, all she can testify to is the FACT she Did Not give the alleged neighbor Plaintiff's medications,

(2) But she shall testify to the Stress and Strain that has been put on our (37) year marriage, including the Embarrassment and Humiliation for both the Reynolds'. , (3) Therefore we are back to two (2) alleged phone calls counsel Vincent/Landes have written to have occurred, but, have FAILED to furnish Plaintiff with copies of those two (2) calls, under DISCOVERY on the date of 10/11/2000.

PAGE 46, is Correct as Written and the Answer on line 3-6 is Correct.

Line 7 is Correct as Written, and Answer line 8-12 is Correct, however, with Plaintiff having to ANSWER IMPROMPTU, he was unable to give counsel Vincent the Case Number, which is:

20051096 CRH, file-stamped 05 DEC 30 PM12:05 placed in MEMORANDUM and marked: PLAINTIFF'S EXHIBIT X-1, by Eunice Adae and IN THE COURT OF COMMON PLEAS, BROWN COUNTY, OHIO and Case No. CVH20060317, EXHIBIT X-2, by Flora Prather, also placed in MEMORANDUM.

Lest THE COURT and counsel Vincent forget, These are the Same neighbors, along with the Parkers, renters of Flora Prather who with her grandson Dwayne Daugherty while at 7021 St. Rt. 221, filed STATEMENTS against Plaintiff FOR INDECENT EXPOSURE with Deputy Sinninger on JAN 4, 1997 and placed in MEMORANDUM as EXHIBIT X-3.

When the Prosecutor's Office FAILED to CHARGE and or INDICT Plaintiff, JAN 10, 1997, Eunice Adae, Flora Prather and Dwayne Daugherty went on the local radio talk show "Hot Line" and broadcast that "The Colonel" did this dastardly deed.

Plaintiff's Letter to the Editor, dated THURS. OCT 14, 1999, and placed IN MEMORANDUM as EXHIBIT X-3 details the incompetency of

the Brown County, Ohio Sheriff's Department to CHARGE for Making False Alarms under ORC Section 2917.32 (A)(1)(2)(3), B, C, and Prosecuting Attorney Thomas F. Grennen's BLANTANT FAILURE to act, when IN FACT he was a Party of the First Part on the "HOT LINE" gossip show and still FAILED to have Plaintiff Arrested.

CONVERSELY, Prosecutor Grennen in concert with Deputy Sinninger FAILED to have each STATEMENT SIGNATORY Arrested, as shown above, they being Flora Prather, her renters at 7101 St. Rt. 221, Jarrad T. Parker, Jenifer A. Parker, Eunice Adae, and her son Dwayne Daugherty and with the exception Eunice Adae to the best of Plaintiff's knowledge, all have records, therefore, Plaintiff claims FOUL.

PAGE 47, from Page 46 line 24, by counsel Vincent, he is so niave' he has thoughts that Plaintiff's mother is still living, and the Answer Page 47 line 1 FAILS to satisfy counsel Vincent. Line 4-7 is Correct as Written.

Line 8 is Correct as Written. Line 9-10, question by counsel Vincent, opened Pandora's Box, wherein the Highway Patrol ask Flora Prather to cut her WEEDS/TREES near St. Rt. 221 so Plaintiff, his wife and their guests could enter upon St. Rt. 221 SAFELY, which she REFUSED to do for the North entrance/exit of Plaintiff's Semi-Circle Driveway. Attached and placed IN MEMORANDUM is PLAINTIFF'S EXHIBIT X-4 depicting her REFUSAL and her TRUE CHARACTER.

Line 10 question by counsel Vincent and line 12-13 question by counsel Vincent and Answer line 14-22 is Correct as Written, however, with Plaintiff being IMPROMPTU he was unable to present counsel Vincent with the CORRECT FACTS about the Brown County, Ohio Sheriff's

Department KNOW VERY LITTLE about the LAW. Attached and placed IN MEMORANDUM is PLAINTIFF'S EXHIBIT X-5, by Sheriff Wenninger and therein his paragraphs 2-3 are the FACT(S) that the Sheriff himself Does Not Know there are LAWS AGAINST LITTERING, under ORC Chapter 3767 (NUISANCES) and therein (OTHER NUISANCES) and or ORC Section 2917.11 (A)(2) IS NOT AND HAS NOT BEEN ENFORCED by the Sheriff's Past and Present, now EXCEEDING TWENTY (20) YEARS.

PAGE 48, is Correct as Written, however, counsel Vincent is on A Fishing Trip for the Number of Persons traveling St. Rt. 221, a State Route that he DOES NOT KNOW THE LENGTH OF for the traffic on a given Day, Week, Month or YEAR. Further, the Brown County, Ohio Sheriff and his Deputies FAIL to write Reports of Investigation(s), therefore, SUPPRESS THOSE EVIDENCES. Attached is PLAINTIFF'S EXHIBIT X-6 as placed IN MEMORANDUM dated 10/24/97 to the Brown County Ohio Commissioners office who IGNORED that letter, therefore, and subsequently dubbed by Plaintiff as, Shemp, Larry and MOE for their FAILURE to ACT or Suggest Resolution for this ON-GOING PROBLEM.

Shemp, Larry and Moe FAIL to have any of the Dog Wardens, their employees, to enforce ORC Section 955.23, now EXCEEDING (20) YEARS.

PAGE 49, is just some more of counsel Vincent's RHETORICAL Fishing Trip, except for his question line 21-24 that has been Ask and Answered on PAGE 46, 47, 48, X-1 to X-6 as placed IN MEMORANDUM.

PAGE 50, is Correct as Written, however, it is Self-Evident that counsel Vincent DOES NOT know the Law evidenced in THE OHIO LAW ABSTRACT, Pages 594-680, 39 ABS concerning "NURIE" from the French word, and applied in the English law indiscriminately to INFRINGEMENTS UPON

THE ENJOYMENT OF PROPRIETARY AND PERSONAL RIGHTS.

Further, the LAW on NUISANCES from 1943 Section 12646 GC. (Page 599 para.1 in part, 2 reads Quoted:

This section of the Code provides:

"Whoever ... uses or maintains a building, structure or place for for the exercise of a trade, employment or business, or for the keeping or feeding of an animal which by occasioning noxious exhalations or noisome or offensive smells, becomes injurious to the health, comfort or property of individuals or the public, or causes or suffers offal, filth noisome substances to be collected or remain in a place to the damage or prejudice or (of) others, or of the public."

What is a nuisance in the law of torts?, in part, Quoted:

It has been said that a nuisance is something obnoxious or offensive, that, that is, it is anything which unlawfully and tortiously does hurt, or causes inconvenience, discomfort or damage to another, and it consists in unlawfully doing an act or omitting to perform a duty, which act or omission damages, injures or endangers the comfort, repose, health or safety of others, offends decency or in any way renders other persons insecure in life or the use of property.

An actionable nuisance is defined by Mr. Cooley in his work on Torts to be anything wrongfully done or permitted, which injures or annoys another in the enjoyment of his legal rights." 30 O. Jur., Sec. 2, page 300.

The statements above made by the text-writer are supported by numerous Ohio cases, the principal ones being Cardington v. Fredrick,

46 Oh St 442 N.E. 776 and Railroad Company v. Carr, 38 Oh St. 448.

While the amount of annoyance necessary to constitute a nuisance cannot be accurately determined, the standard must be notions of comfort entertained by persons of ordinary sensibilities. Columbus Gas & Light Co. v. Freeland, 12 Oh St 392, Welishann v. Kemper, 27 N.P. (N.S.), 269.

Some search has been made for a reported case in Ohio upon the question of nuisance caused by the barking of dogs, but nothing directly in point was found. However, in the case of Seegueller v. Pahner, 9 C.C. Rep. (N.S.), 333 the court recognizes the possibility of such being a nuisance, when it states in the at page 336.

"It might be a nuisance to keep a barking dog."

In the case of Herring v. Wilton, 106 Va. 191 the court was called upon to consider the barking of dogs as a nuisance.

"Dogs in a neighbor's yard may effectually hinder sleep and disturb the reasonable enjoyment of a home, and where the great and continuance annoyance and discomfort are created by the howling and barking of dogs and the whining of puppies, and the rest of a neighbor and his family is disturbed and sleep is interrupted and he is disturbed in the reasonable use and enjoyment of his property, a court of equity will interpose by injunction to enjoin and restrain the nuisance."

When Plaintiff and his wife, Phyllis J. Reynolds moved into their new home on NOV 5, 1985 there was an old two story house approximately 180 feet to the South of Plaintiff's property on St. Rt. 221 that was unfit for human habitation. Three of the four boys that lived there are now, and or were in Prison.

To the North of Plaintiff and his wife, Phyllis J. Reynolds was a 2nd

old two-story farm home at 7061 St.Rt.221 that belonged to Bill and Flora Prather, with some 35 acres of land that they used to raise Cash Crops such as corn, tobacco.

Plaintiff does not recall the date but the old farm house at 7061 St. Rt.221 caught fire and was a total loss.

The Prathers moved in a nice Double-Wide and set up house keeping anew.

Plaintiff COMPLAINT being that shortly thereafter The Prathers began to move in a bunch (5) total) old Junk Trailers at 7021 (One within 40 feet of Plaintiff's property line), 7062, 7082, 7098, 7101 and the most recent a nice Double-Wide at 7043, all on St.Rt.221 for a total of six (6) that they arbitrarily rented out, without background checks, to anyone that had a Security Deposit and the First Months Rent.

These are the same Renters and or Family of Bill and Flora Prather, who brought their Damm Barking Dogs, Junk Vehicles, some licensed, some not, including A Kennel of Pit-Bull Dogs and other Vicious/Dangerous Dogs in violation of ORC Section 955.22, and evidentially described in PLAINTIFF'S EXHIBIT D and therein EXHIBIT 8.

1/31/2000 neighbor to the South of Plaintiff at 6949 St.Rt.221, Mike Flaughner called E-911 stating that Plaintiff had SHOT HIS PUPPY COLLIE in Neck and Back Three (3) times and on the same tape recording in the LEG and NECK, at 21:17 hours, that date. (In Plaintiff's world, on 1/31/2000 at 8:17PM it is a LITTLE MORE THAN DARK OUTSIDE, it is DAMM DARK to be shooting a rifle as described on that tape by Mike Flaughner.)

Counsel Vincent FAILED to listen to this tape recording in Chambers, just like he FAILED to listen to the COMPLETE Recording Plaintiff received

from his Former Counsel Jon C.Hapner as he received it from Prosecutor/ Investigator Bobby Gifford. (Appears to Plaintiff that the Tape Recording has been tampered,after the recording was allegedly made by Defendant Deputy Chris Snider on 10/11/2000 as it Slows Down and Speeds Up inaudibly to the human ear.

Further,on another Tape Recording,2/10/2000 Mike Flaucher called E-911 for his dog allegedly being shot by Bill Reynolds.,and:

5/27/2000 Report of Investigation # 14-00-1483 on COMPLAINT by Plaintiff at 2130 hours,Deputy Shaw's Report of Investigation is self-explanatory. Located in PLAINTIFF'S EXHIBIT D and therein EXHIBIT 8,is STATEMENT OF:.,as written by Deputy Shaw makes it self-evident THE ONLY DOG WITH A LICENSE is Item 3 a Tan Collie W 3 pups All Female,Tag no. K-460 2000,indicating a Kennel. This is the same dog Mike Flaucher called E-911 on 1/31/2000 alleging Bill Reynolds shot his dog "IN THE DARK" at 21:17 hours hitting it in the NECK and BACK THREE (3) TIMES and on the SAME CALL hitting it in the LEG and NECK.

With the Exception of the Collie with tag K-460,Deputy Shaw REFUSED to Impound EACH if the UnLicensed Dogs in violation of ORC Section 955.22 A-E, he has taken an OATH to do. Ref. PLAINTIFF'S EXHIBIT D and therein EXHIBIT 5 dated 05-15-00,being self-evident that Plaintiff DOES NOT get EQUAL PROTECTION of the LAWS,under U.S.Constitution,Amendment XIV Section 1,OHIO CONSTITUTION,Article I Section 9,and 10,ORC Section 2935.05 and 2935.09.

Also see PLAINTIFF'S EXHIBIT E and therein EXHIBIT A as written by Sheriff Crawford,a demonstration of both his COMPREHENSION ABILITIES and GRASP of the ENGLISH LANGUAGE,that Qualified him for two terms in office, that Plaintiff DOES NOT AGREE TO.,and:

See Plaintiff's EXHIBIT D, and therein EXHIBIT B for Report of Investigation no.14-00-2459 written by Deputy Lt.Frank Lambros,dated 8/8/2000 that is self-evident that he knows Absolutely Nothing about ORC 955.01 to 955.99,2917.11 (A) or Chapter 3767 concerning Barking Dogs.

Further,Lambros' PERSONAL INEPTNESS in his INVESTIGATIVE ACTION becomes Vividly Clear to Plaintiff,as follows:

1. Lambros has taken an OATH to enforce the U.S. and Ohio Constitutions, and the Ohio Revised Code (ORC) that is self-evident he knows Very Little About,to wit:

2. Offered to send copy of 14-00-2459 to the Dog Warden. Lambros and the Dog Warden are suppose to be enforcing ORC Section 955.12,The Dog Warden by 955.23,then 955.12. Had Shemp,Larry and Moe instructed THEIR EMPLOYEES about 955.23,none of this would have happened.

3. Lt.Lambros: ADVISED HIM BARKING DOG AT 900PM IS NOT AN OFFENCE-REYNOLDS DISAGREED. Plaintiff Does Not Know how Lambros came up with that Bull-Shit because the OHIO LAW ABSTRACT 39 Abs previously Quoted herein,and ORC Section(s) 2917.11 (A)(2),CHAPTER 3767 has Prohibitions against NOXIOUS EXHALATIONS,self-evident the Brown County Ohio Sheriff's Department,knows Nothing about,that became effective 10/1/1953.

4. Lt.Lambros made the rank of Lt.in the Sheriff's Department and CANNOT spell OFFENCE Correctly (OFFENSE).

5. REFERED TO PROSECUTORS OFFICE. It is self-evident that from 8/8/00 900A that the Prosecuting Attorney Thomas F.Grennen FAILED to Enforce the law for Plaintiff under U.S. Constitution,Amendment XIV Section 1,Ohio Constitution Article I Section 9,10,ORC Section 2935.05 and 2935.09.

PAGE 51, is NOT Correct as Written. Line 6 is WRONG, 60 acres is Correct.

Counsel Vincent IGNORES Plaintiff's Answer line 24, Page 50, and finished Page 51 line 1.

Q. Line 14: What years did you have those dogs?

A. Oh, Lord. We had to have the beagle dog euthanized because the dog warden and the commissioners wouldn't enforce the law.

Q. What do you mean by that?

A. They wouldn't enforce the law for me.

Q. What do you mean by that?

A. They wouldn't take it to the sheriff's department and enforce the law. I'm talking about 3767.13.

Q. Wait a second here. This is a (Cont. PAGE 52.) deposition. It's my chance to learn what you believe and what you think. What do you mean by the dog warden and the sheriff's department wouldn't enforce the law, what law?

A. The law is that dogs had to be licensed. That's the law.

Q. All right. Where is that law?

A. 955.01 through 955.99.

Q. Of what?

A. Ohio Revised Code.

Q. How about the county of Brown County?

A. The what?

Q. Brown County.

A. That's Brown County, yes.

Q. Do they require dogs to be licensed in Brown County?

A. Absolutely. It's a state law.

Q. No it's not, but that's fine do you believe it is?

A. I do believe it is.

Line 21-24, is just more of counsel Vincent's Rehtorical Rambling.

PAGE 53, is NOT Correct as Written on line 20 the name Mike Flocker is Wrong, and counsel Vincent and or Denise L. Shoemaker FAILED to question the spelling which is (Flaughter).

Line 1-19 are Correct as Written, Line 20-23 are Correct as Written, the Exception shown just above. FAILURE to enforce ORC by Dog Warden is shown in ORC Section 955.23 that counsel Vincent stated on PAGE 52 line 18-19 WAS NOT A STATE LAW.

The Sheriff and, EACH, Deputy Dheriff have TAKEN AN Oath to enforce the U.S. and Ohio Constitution(s), Amendment(s) and Article(s) therein, and PLAINTIFF'S EXHIBIT D and therein EXHIBIT 8, consisting of (12) pages are the Irrefutable Fact(s) that the Sheriff and his Deputies FAILURE to enforce the law for Plaintiff.

PLAINTIFF'S EXHIBIT E and therein EXHIBIT A demonstrates Sheriff Crawford's LACK of COMPREHENSION ABILITIES and Command of the English Language. EXHIBIT B demonstrates Sheriff Crawford's Lt. Frank Lambrose's COMPREHENSION of the LAW. Lastly, it demonstrates Prosecuting Attorney Thomas F. Grennen's FAILURE as Chief Legal Counsel, Brown County, Ohio to Enforce the Law for Plaintiff, each named person violation of U.S. Constitution, Amendment XIV Section 1, at a minimum.

PAGE 54, is Correct as Written, however, Counsel Vincent has FAILED to Read the Content of the immediate two (2) paragraphs above, previously mailed to him and the Court. To this point in my life I ALWAYS BELIEVED THERE WERE NO DUMB/STUPID QUESTIONS, however, counsel Vincent PROVED THAT TO BE UNTRUE.

Line 22-24 is True and Correct.

PAGE 55, is Correct as Written and just some more of counsel Vincent's Rheortie and TRICKERY from line 12 to 24 by Screwing the dates around.

PAGE 56, is Correct as Written and a Meaningless Rhetoric by counsel Vincent.

PAGE 57, is Correct as Written. Line 4 states there were two (2) Barking dogs.

Not one but two. Line 7 states they were at: 7021 State Route 221, and PLAINTIFF'S EXHIBIT D and therein Exhibit 8 shows the two (2) dogs were located at 7021 St.Rt.221, belonged to Belinda Hodge, and on 10/11/2000 WERE NOT LICENSED. Belinda Hodge then Licensed both of the dogs on 102500 (10/25/2000)

Line 10-11, Plaintiff states where they were tied. EXHIBIT 8 shows one dog to be a Lab Hound Mix, but, not, what it was mixed with, however, the 2nd dog was a Lab Chow Mix, therefore, pursuant to ORC Section 955.22 (A)(B)(C) (D) (1)(2)(a)(b)(c) (E) were applicable. Further, the Dog Warden's FAILURE under ORC Section 955.23 is self-evident as is the Sheriff and each deputy's FAILURE to Enforce the Law is also self-evident.

Plaintiff's Tape Recordings on 10/11/2000 state which Sections of the Revised Code were being violated AND THE ADDRESS, at 12:20AM, 1:25AM and 4:22AM 10/11/2000, then when Defendant, Deputy Chris Snider CALLED Plaintiff he was TOLD AGAIN that it was next door and PLAINTIFF'S EXHIBIT D and therein EXHIBIT 2 is Irrefutable Evidence that it wasn't Plaintiff's DOG THAT WAS BARKING as Defendant Snider thinks in his CALL to Plaintiff on 10/11/2000.

Lastly, Both Defendant(s) Deputy Chris Snider on 15 NOV 2002 and Larry Meyer on 6 NOV 2002 by AFFIDAVIT and therein EACH in their respective

#3 in part reads, Quoted: On or about October 11, 2000 at approximately 4:30 a.m. I was dispatched to 7013 State Route 221, Georgetown, Ohio for complaints of barking dogs. This address is known to me as the residence of William Reynolds who has been repeatedly arrested for his misconduct within Brown County, Ohio.

By definition of the word "REPEATEDLY ARRESTED", Defendant(s) Deputy Chris Snider and Larry Meyer are OBLIGATED to produce their Evidence of Fact that Plaintiff has been Repeatedly Arrested, and as a starting point for them Plaintiff offers:

PLAINTIFF'S EXHIBIT X-8, placed IN MEMORANDUM, whose Cover-Letter is dated APR 3, 1998, Case No. 98CRB1717 (01-02) under RULE 16 DISCOVERY COMPLIANCE BY THE STATE OF OHIO, and therein, B., DEFENDANT'S PRIOR RECORD. None., therefore, commencing APR 3, 1998 to OCT 11, 2000 an elapsed time of Two (2) Years Six (6) Months and Eight (8) Days, Defendant(s) Chris Snider and Larry Meyer SHALL produce REPEATEDLY ARRESTED RECORDS, for Plaintiff, or EACH of their Sworn Affidavits are FALSIFIED, and when the Jury hears that they will find PERJURY.

PAGE 58, is NOT Correct as Written. Line 18 The were new people, is WRONG.

PAGE 59, is Correct as Written. Flora Prather shall produce her Rental Agreement(s) that will show SOURCE OF INCOME, for her rental properties on St. Rt. 221. PLAINTIFF'S EXHIBIT D and therein EXHIBIT 8 is the first indication of Welfare Bums, the TRAILER at 7021 St. Rt. 221 only has two (2) Bedrooms and there were two (2) boys One (1) girl and the divorced mother, is also another indicator of Welfare Bums, coupled with the DURATION of the rental.

PAGE 60, is Correct as Written. Line 3-19 shall be gone over at Trial, in depth. Line 20-24 shows counsel Vincent's Chaos in Deposition, because in Brown County, Ohio YOU DO NOT CALL THE SHERIFF'S DEPARTMENT. (See PAGE 61.)

PAGE 61, is NOT Correct as written. Line 15, THERE ISN'T ANY CHAPTER 3767.13, but, there is a CHAPTER 3767 and contained therein are the PROHIBITIONS for Noisome Exhalations, that is told in EACH of Plaintiff's three (3) calls on 10/11/2000 at 12:20AM, 1:25AM, 4:22AM, IGNORED, by Defendant(s) Deputy Chris Snider and Larry Meyer.

PAGE 62, is Correct as Written. Counsel Vincent is NOT familiar with ORC Section 2917.11 (A)(2) or CHAPTER 3767, ORC. Line 6 question and Answer line 8, 9 is True and Correct, and Proven, by the FACT neither Defendant(s) Deputy Chris Snider or Larry Meyer responded to ANY OF THE THREE (3) calls Plaintiff made on 10/11/2000, alleging they WERE DISPATCHED in EACH of their Sworn AFFIDAVITS, therefore, PLAINTIFF'S EXHIBIT D and therein EXHIBIT(s) 1, 2, 3, 4, 5, 8 are APPLICABLE as if ReWritten hereon.

PAGE 63, is Correct as Written, line 4-9 is FAILURE to ENFORCE THE LAW. Line 10-19 questions and answers are CORRECT, however, DEFENDANT'S EXHIBIT A denies Plaintiff from Examination/Cross Examination of Supervisor (W C), SUPP Report by Defendant, Deputy Chris Snider and therein line 6-8 in part reads, Quoted: I/O TryeD To exPLain THaT I PaTroLeD The area and Found NO DoGs BarKing buT IN His Back Yard., PLAINTIFF'S EXHIBIT D and therein EXHIBIT(s) 2 Shows Plaintiff's dog was EUTHANIZED Fifty Two (52) Days BEFORE Defendant, Deputy Chris Snider "PATROLED THE AREA" and 8 shows that if Defendant(s) Deputy

Chris Snider and Larry Meyer had gone to the address Plaintiff gave in EACH of his three (3) phone calls on 10/11/2000, and told Chris Snider TWICE in his Illegal call to Plaintiff at 4:30AM, wherein he even IDENTIFIED Plaintiff's dog by Breed as can be heard on the Tape Recording.

PAGE 64, is Correct as Written. Answer, line 15-16 are the ORC Section numbers the Sheriff and his Deputies REFUSE TO ENFORCE for Plaintiff, therefore, their FAILURE to Enforce U.S. Constitution, Amendment XIV Section 1, Ohio Constitution Article 9, 10, FAILURE to Write and File Jurat, [Cite as State v. Green (19880, 48 Ohio App. 3d 121.), and Defendant, Deputy Clark Gray is in Violation of writing COMPLAINT against Plaintiff as, HE WAS NOT WITNESS, to any alleged crime on 10/11/2000 under ORC Section 2935.09.

PAGE 65, is Correct as Written. Line 22-24 and continuation PAGE 66 line 1-3, Plaintiff's Answer is Correct.

Who the HELL does Angela Snider think she is by QUESTIONING Plaintiff or any other Citizen calling with a COMPLAINT, in this case BARKING DOGS. Her Husband Chris Snider and Larry Meyer in concert with Sheriff Windell Crawford, ARE SO BLANTENTLY INEPT, they know very little about the law, and NOTHING ABOUT ORC Section 2917.11 (A) or CHAPTER 3767 and therein Prohibitions under ORC Section 3767.13.

PAGE 66, line 1-3 were answered on PAGE 65, just above. The balance is Correct as written, requiring Comment, Clarification.

Defendant, Deputy Chris Snider on 10/11/2000 was a ROAD DEPUTY,

and his wife, Angela Snider, is a Dispatcher in the Communications Center (A COMPLETELY SEPARATE BUILDING) from the Sheriff's Office/ Department, however, Sheriff Crawford, as early on as 05-15-2000, PLAINTIFF'S EXHIBIT D and therein EXHIBIT 5 DENIED Plaintiff Law Enforcement under ORC Section 2917.11 (A), Chapter 3767, U.S. and Ohio Constitutions, respectively, Amendment XIV Section 1, Article 9, 10.

Sheriff Crawford was in charge of the Comm. Center, therefore, NEPOTISM ABOUNDED, and Sheriff Crawford, WAS IN CONFLICT OF INTREST, by being in charge of the Comm.Center[t]hus that is how PLAINTIFF'S EXHIBIT D and therein EXHIBIT 5, came into being, and in violation of U.S. and Ohio Constitutions, respectively, Amendment XIV Section 1, and Article 9-10.

Lastly, When the Court carefully looks at PLAINTIFF'S EXHIBIT A and therein the Written Statement by Defendant, Deputy Chris Snider that reads, Quoted:

I/O's ReSPOnDeD aFTer Being Cussed on THE PHone at 911.

Plaintiff already has, as this Court should wonder why these two (2) Road Deputies, Snider, Meyer, are FUCKING OFF INSIDE THE COMMUNICATIONS CENTER, when in, FACT, both have direct communication from their respective Patrol Cruisers??

The next, FACT, this Court should ponder, and adjudicate, is WHY did both Snider and Meyer in their respective SWORN AFFIDAVITS, PLAINTIFF'S EXHIBIT F and therein, DEFENDANT'S EXHIBIT 1 and 2, Swear they were DISPATCHED, to Plaintiff's home when in, FACT, Plaintiff's dog was dead, and Who DISPATCHED them, Tape Recording shall be required.

Lastly, Who, corrected their grammar in each DEFENDANT'S EXHIBIT 1, 2,

and as can be heard by Andrea Snider in one of the two Illegal calls made by Defendant, Deputy Chris Snider of: Come on in Rick, suggesting to Plaintiff that there is more going on inside the Communications Center, than communications.

PAGE 67, is Correct as Written and is self-evident to Plaintiff, as it should be to the Court and counsel Vincent that Plaintiff Was Not getting Law Enforcement, for Barking Dog(s) in violation of U.S. and Ohio Constitutions, respectively Amendment XIV Section 1, Article 9, 10, ORC Section 955.22, 23, and Chapter 3767. See PLAINTIFF'S EXHIBIT D and therein EXHIBIT 5.

The Dog Warden FAILED to enforce ORC Section 955.23 in the year 2000 and Michael Darnall has been Charged with Theft in Office by the Brown County, Ohio Prosecutor's Office, (2) Indicted by the Grand Jury for Theft in Office, (3) Terminated from employment as Dog Warden, (4) Has been replaced by Shemp, Larry and Moe, wherein, the Same Vicious Cycle Begins Anew as evidenced in PLAINTIFF'S EXHIBIT X-6-1, News Democrat article 6/18/2006 and Brown County Press 6/11/2006.

No where in, either article, Does the NEW BROWN COUNTY, OHIO Dog Warden Reggie McKenzie state that he is MANDATED to Enforce ORC Section 955.23.

PLAINTIFF'S EXHIBIT X-7, depicts how Shemp, Larry and Moe have permitted "ABSENTEE MANAGEMENT" of the Animal Shelter, therefore, ORC Section 955.23 FAILS to be enforced, thanks to Shemp, Larry and Moe.

PAGE 68, is Correct as Written, however, and as stated, line 2-3 emphasizes everything written for PAGE 67 above as if rewritten herein, except for line 18-24 that is self-evident to have fallen on Deaf Ears of Defendants, Deputies Chris Snider and Larry Meyer, and Evidenced as such

in PLAINTIFF'S EXHIBIT A that in part, LINE 4-5 reads for (TWO ROAD DEPUTIES)Quoted:

I/O's ResPonDeD aFtEr BeIng CusseD on ThE PhOnE at 911.

1. The Court and counsel Vincent must agree that for the ONLY TWO ROAD DEPUTIES in Brown County, Ohio to be FUCKING OFF INSIDE THE BROWN COUNTY, OHIO Communications Center is ILLEGAL because they have Radio Communications into the Comm.Center.

2. Why didn't Defendant, Deputy Larry Meyer in his SWORN AFFIDAVIT PLAINTIFF'S EXHIBIT F, and therein, DEFENDANT'S EXHIBIT 2, FAILED to Patrol the Area, when in FACT he states HE WAS DISPATCHED to Plaintiff's home, BUT, never confirms PLAINTIFF'S EXHIBIT A to be TRUE AND CORRECT.

3. Both Chris Snider and Larry Meyer FAIL to state that Plaintiff answered the door in his SCIVIES and TEE-SHIRT on 10/11/2000 but FAIL to State that Plaintiff was wearing his CADUCEUS, and PLAINTIFF'S EXHIBIT D and therein EXHIBIT 4 consisting of 8 pages of Prescription Medication(s) makes EACH of their SWORN AFFIDAVIT(s) DEFENDANTS EXHIBITS 1 and 2 and therein #8 is FALSIFIED by both deputies.

4. From #2 above, and with Defendant, Deputy Larry Meyer being the SENIOR OFFICER, why did he permit Defendant, Deputy Chris Snider to call Plaintiff's home, when he too heard Plaintiff's call at 12:20AM and or the relayed message from Dispatcher Shaun Luther.

PAGE 69, From PAGE 68 line 21-24 is NOT Correct as Written, Quoted: A. We must backtrack to the first call at 12:20 a.m. wherein I told Luther, that would be Shawn (Shaun spelled incorrectly) Luther who was the dispatcher, he ask me for my phone number, which I gladly gave him, and I said, you don't have them call me down here, you have them come down here. Meaning the sheriff's department.

Counsel Vincent has heard that 1st call to the Comm.Center at 12:20AM, 10/11/2000, and the ADDRESS where the Barking Dogs were located, therefore, BOTH Defendant(s) Deputies Chris Snider in concert with Larry Meyer FAILED to give Plaintiff, Equal Protection Under The Law, in violation of U.S. and Ohio Constitutions respectfully Amendment(s) V, XIV Section 1, Article 9, 10 and ORC Chapter 3767, ORC Section 2917.11, on 10/11/2000, FAILED to write and File JURAT under Crim Rule 3.

Fact, of this FAILURE to respond to the CORRECT ADDRESS stated in EACH of Plaintiff's three (3) calls on 10/11/2000, then Defendant, Deputy Chris Snider's two (2) ILLEGAL CALLS to Plaintiff's home are recorded at 4:30 AM and 4:31AM. Counsel Vincent's line 21-22 is his personal failure, to account for the Correct Time, and Who called Whom.

PAGE 70, is Correct as Written. Counsel Vincent's Convolutd Distortion of FACTS is self-evident on this Page, as follows:

1. Plaintiff's 1st call to Comm.Center at 12:20AM, specifically, states the sheriff's office was not to call down here, but to come down here, the ADDRESS stated in that call, the ORC Section 955.22, 955.23 is Evidence of FACT, FAILURE, by the Sheriff's Department, Defendant(s) Deputies Chris Snider and Larry Meyer's to enforce those laws they EACH have taken an OATH to do, and applied to the date of 10/11/2000.

2. Line 1-6 serves as counsel Vincent's ADMISSION that Plaintiff had been DISTURBED MORE THAN ONCE, BY THE SHERIFF'S DEPARTMENT.

3. Line 7-8, IS THE CORRECT ADDRESS FOR BARKING DOGS, as can be heard on EACH of Plaintiff's three (3) calls on 10/11/2000, AND:

4. Defendant, Deputy Chris Snider ILLEGALLY called Plaintiff's home twice, (2) times, on 10/11/2000 at 4:30AM and Again at 4:31AM as can be heard on Tape Recording, when IN FACT he was told NOT TO CALL DOWN HERE

in Plaintiff's 1st call at 12:20AM. Therein, Plaintiff AGAIN told Defendant, Deputy Chris Snider THE PROBLEM WAS NEXT DOOR, which means he FAILED to COMPREHEND the ADDRESSES on EACH of Plaintiff's three (3) calls on 10/11/2000.

PAGE 71, is Correct as Written. Line 12 Answer reads Quoted: A. Other than the fact I said don't have him call down here, have him come down here. (The ADDRESS is on EACH of the three (3) calls made by plaintiff on 10/11/2000 and the LOCATION is on Deputy Snider's FIRST ILLEGAL CALL TO Plaintiff on 10/11/2000 are on Tape Recordings, yet to be played to the Court.)

Line 15-16 Answer by Plaintiff reads, Quoted: A. No I don't recall anything else. It's all on the tape. We'll play it.

PAGE 72, is NOT Correct as Written. Line 6-7, Ms. Shoemaker's information from counsel Vincent is INCORRECT and or her STENOGRAPHY skills are more than a little questionable for how Angela Snider's last name is spelled.

Line 13-16 reads quoted: A. She said the sheriff said not to respond, they won't respond to dog calls because that was to be turned over to the dog warden. The dog warden doesn't work at night. (Ref. PLAINTIFF'S EXHIBIT D and therein EXHIBIT 5 that specifically Singles Out Bill Reynolds (Plaintiff) from Law Enforcement in violation of U.S. and Ohio Constitution(s), respectively, Amendment XIV Section 1, Article 9-10, ORC Section 955.22, 955.23, 2917.11 (A) and CHAPTER 3767.

Line 18 reads, Quoted: They just don't enforce the law.

PAGE 73, is NOT Correct as Written. Line 7-8, line 15, Ms. Shoemakers information from counsel Vincent is incorrect and or her STENOTPY skills are more than a little questionable for how Deputy Snider's name is spelled in both places, because, she uses, Snyder.

Line 18 is how Plaintiff answered the phone at 4:30AM 10/11/2000, and reads, Quoted: What the hell can you want? This is Deputy Schnider from Sheriff's Office. What the hell is wrong with you? Nothing is wrong with me, sir what's wrong with you? Get your ass down here Goddam it I don't own a fucking dog. You don't own a beagle dog? I don't own a fucking dog at all. Okay then, sir if you don't own a dog while I was down there patrolling (its next door) while I was down there patrolling I heard a dog behind hour house barking. No, there's no dog down here Damm it, its next door, what the hell's wrong with you? Well, sir while I was there. Get your ass down here and come to my door. While I was there, call that cock-sucker, dial that mother-fucker back. (As Andrea Snider giggles like a school girl.) (See PLAINTIFF's EXHIBIT D and therein EXHIBIT(s) 2 and 8 for the FACTS.)

PAGE 74, is NOT Correct as Written. Backtrack to PAGE 73 line 24 reads, Quoted: He said this is Deputy Schnider, I (PAGE 74.) can hear Schnider, (The balance of line one (1) IS FALSIFIED BY Ms. Shoemaker and reads) it's Snyder, S-n-y-d-e-r, from the sheriff's department.

Page 73 line 18 just above is a, Verbatim Quote, for Defendant, Deputy Chris Snider's ILLEGAL 1st phone call to Plaintiff on 10/11/2000, at 4:30AM.

1. Nowhere in Case No. 20010713 Common Pleas Court Brown County, Ohio